

**DOCKETED**

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*Comment Received From: County of Los Angeles  
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**on Convenient, High Visibility, Low-Cost Level-2 Charging  
Solicitation**

*Additional submitted attachment is included below.*



# County of Los Angeles INTERNAL SERVICES DEPARTMENT

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**SELWYN HOLLINS**  
Director

*"Trusted Partner and Provider of Choice"*

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October 7, 2022

Drew Bohan, Executive Director  
California Energy Commission  
715 P Street,  
Sacramento, CA 95814

**Re: Comments on Convenient, High-Visibility, Low-Cost Level-2 Charging (CHILL-2) Solicitation**

Dear Mr. Bohan,

On behalf of the County of Los Angeles (County), we thank you for the opportunity to submit comments on the California Energy Commission's Convenient, High-Visibility, Low-Cost Level-2 Charging (CHILL-2) solicitation. The Internal Services Department (ISD) plays a major role in supporting all County departments and commissions; and our Office of Energy and Environmental Services (EES) operates one of the nation's largest networks of municipally owned electric vehicle supply equipment (EVSE). Since 2015, the County has installed nearly 900 Level 2 and Direct Current Fast Charging (DCFC) ports at 70 County facilities. An additional 1,000 ports across 100 sites are currently under development to support County fleet electrification and provide vehicle charging for employees as well as the public.

The County has the largest population of any county in the nation with just over 10 million residents, accounting for approximately twenty-seven percent (27%) of California's population. The County is also home to more than fifty percent (50%) of the state's disadvantaged communities (DACs) at or exceeding the seventy-fifth percentile (75%) per CalEnviroScreen 4.0 DAC criteria. The communities especially impacted by pollution surround the ports of Los Angeles and Long Beach (POLA and POLB) which serve as a global hub for drayage and goods movement. Together POLA and POLB are the largest ports in the nation, moving over twenty (20) million cargo containers in 2021 alone as well as being the single largest fixed source of air pollution in Southern California.

We have an intimate knowledge of the issues facing our most vulnerable communities, and the extensive reach of our growing network uniquely positions the County to develop critical infrastructure in areas that are often disproportionately burdened by environmental pollution and historically underserved. We are at the forefront of electrification and appreciate the chance to share our comments on this important program.

We respectfully submit the following comments and questions indicating areas of improvement and clarification for the CHiLL-2 program:

1. **California Energy Commission (CEC) should require that applications include municipal entities such as cities or counties as at least one of the partners.** We suggest that the CEC adjust the partnership requirements for CHiLL-2 applications to require local government partners to be on the submitting team.
  - a. Cities and counties are often reliant on incentive programs such as CHiLL-2 to fund their transition to vehicle electrification.
  - b. Cities and counties have a deep understanding of local issues and extensive experience engaging with communities to face our greatest problems.
  - c. Cities and counties are uniquely poised to address critical issues in our communities because of our fundamental directives to serve and provide solutions that are free from private sector limitations. We encourage public private partnerships, but believe city and county entities are best suited to lead these efforts

By requiring one or more of these entities to be on the grant team, the CEC will ensure that local municipalities will be heavily involved in the development and implementation of projects in their jurisdictions that best serve their residents and reach their local electrification goals. An example of such electrification goals is the 2019 Our County regional sustainability plan released by Los Angeles County which tasked ISD with installing 5,000 EV charging stations at County facilities by 2025.

2. **County requests clarification from the CEC regarding participation of state entities.** Are state of California entities located on or in proximity of the proposed project site eligible to be partners on the CHiLL-2 application?
3. **County requests clarification from the CEC regarding project sites.** Are projects sites with multiple different site types eligible to have all CHiLL-2 funded chargers located at that one site?

We are supportive of the CEC's goal to deploy and enhance the perception of Level-2 EV charging infrastructure through the deployment of chargers in highly dense and visible areas. Please do not hesitate to reach out to ISD's General Manager of Energy and Environmental Services, Minh Le, at [MSLe@isd.lacounty.gov](mailto:MSLe@isd.lacounty.gov) as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the development of CHiLL-2.

Sincerely,

Minh Le  
General Manager of Energy and Environmental Services  
Los Angeles County Internal Services Department  
[MSLe@isd.lacounty.gov](mailto:MSLe@isd.lacounty.gov)